

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Robert Fischer and Stephanie Lukis,)	
individually and on behalf of all others)	
similarly situated,)	Case No. 1:19-cv-04892
)	
Plaintiffs,)	Honorable Manish S. Shah
)	
v.)	
)	
Instant Checkmate LLC,)	
)	
Defendant.)	

JOINT STATUS REPORT ON SETTLEMENT

Pursuant to the Court’s July 17, 2023 minute order, (Dkt. 258), Plaintiffs Robert Fischer and Stephanie Lukis and Defendant Instant Checkmate LLC (collectively, “the Parties”), by and through their attorneys, submit the below joint status report on the finalization of the Parties’ proposed class action settlement of this matter:

1. The Parties reached a settlement in principle of this action in May 2023, with the assistance of the Hon. Sidney I. Schenkier (Ret.) as mediator. The Parties previously requested that the Court suspend briefing on Defendant’s motion to decertify the Class pending presentment of that settlement for approval, which the Court granted. (Dkt. 254.) The Court ordered the Parties to submit a joint status report or move for preliminary approval of the proposed settlement by August 4, 2023. (Dkt. 258.)

2. Since the Parties’ last status report, they have continued to work diligently on finalizing a full settlement agreement and all supporting documents, including circulating multiple redlined drafts and conferencing to discuss the same. The Parties have made significant progress. The Parties continue to work to resolve an outstanding issue with respect to wording in one element

of the notice exhibits. They have exchanged multiple competing proposals and have conferred in an effort to resolve their differences on this point.

3. Mindful that the Court has already extended this deadline, the Parties respectfully request a final twenty-one days to complete the drafting and signature-gathering process. The Parties are, of course, more than willing to attend a status conference with the Court to apprise it of their progress and the particulars of their remaining disagreement.

4. In order to allow the Parties to complete the drafting process, obtain signatures to the final settlement, and for Plaintiffs to finalize their preliminary approval and related filings, the Parties respectfully request that the Court enter a similar order to docket entry 258, with a deadline of August 25, 2023, or other similar deadline at the Court's convenience.

Dated: August 4, 2023

Respectfully Submitted,

INSTANT CHECKMATE LLC

By: /s/ Debbie L. Berman (with permission)

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